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Attorneys for Defendant
NORTHSTAR LOCATION SERVICES, LLC

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Attorneys for Plaintiff
NICOLE DIANE LA CARIA and the Class

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NICOLE DIANE LA CARIA, on behalf of herself
and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC, A
New York limited liability company, and JOHN
DOES 1-10.

Defendant.

CASE NO.: 2:18-cv-00317-GMN-DJA

Honorable Gloria M. Navarro

**JOINT STIPULATION AND ORDER
TO EXTEND DEADLINES AND
HEARING IN ORDER GRANTING
PRELIMINARY APPROVAL OF
CLASS SETTLEMENT [ECF NO. 75]**

[First Request, per Local Rule IA 6-1]

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300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

TO THIS HONORABLE COURT:

Plaintiff Nicole Diane La Caria and defendant Northstar Location Services, LLC (“Northstar”) hereby stipulate as follows:

WHEREAS, on January 11, 2021, the Court entered an order granting preliminary approval of the class settlement (Dkt. No. 75) (the “Order”). The Order set forth the deadlines for class counsel to file their motion for attorneys’ fees and cost, and to mail direct notice to the class members. Both deadlines are presently set for February 10, 2021. In addition, the Order set the final fairness hearing for May 11, 2021, 11:00 am.

WHEREAS, the Parties seek to extend certain deadlines in the Order and continue the final fairness hearing, as follows:

- Last day to mail notice to the class members: March 4, 2021
- Last day for class counsel to file their motion for attorneys’ fees and expenses: March 4, 2021
- Final Fairness Hearing: June 1, 2021, 11:00 a.m.

WHEREAS, good cause supports the Parties’ stipulated request for a continuance of the aforementioned deadlines and hearing. That is, the Parties have discovered that the class size and settlement amount may result in tax reporting obligations. To permit the claims administrator sufficient time to ensure both timely payments to the class members and compliance with tax reporting requirements, the Parties believe the requested extension of time is necessary.

WHEREAS, the Parties have not made any prior request for a continuance of the deadlines and hearing dates in the Order.

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1 NOW THEREFORE, the Parties hereby agree and stipulate to extend the unexpired
2 deadlines and hearing dates in the Order as set forth above.

3 Respectfully submitted,

4 Dated: February 5, 2021

GORDON REES SCULLY MANSUKHANI, LLP

5 By: /s/ Craig J. Mariam

6 Craig J. Mariam

7 Stephanie L. Cobau

8 Attorneys for NORTHSTAR

LOCATION SERVICES, LLC

9 Dated: February 5, 2021

GESUND & PAILET, LLC


10 By: /s/ Keren E. Gesund (with authorization)

11 Keren E. Gesund

12 Attorneys for NICOLE DIANE LA CARIA and
13 the Class
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17 **IT IS SO ORDERED.**

18 Dated this 8 day of February, 2021

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22 Gloria M. Navarro, District Judge
23 UNITED STATES DISTRICT COURT
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Attorneys for: Defendant NORTHSTAR LOCATION SERVICES, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLE DIANE LA CARIA, on behalf of herself
and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC, A
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DOES 1-10.

Defendant.

CASE NO.: 2:18-cv-00317-GMN-
GWF

Honorable Gloria M. Navarro
Magistrate Judge Daniel J. Albregts

PROOF OF SERVICE

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. One of my business addresses is: Gordon Rees Scully Mansukhani, LLP, 300 S. 4th Street, Suite 1550, Las Vegas, NV 89101. On February 5, 2021, I served the within documents:

1. JOINT STIPULATION AND ORDER TO EXTEND DEADLINES AND HEARING IN ORDER GRANTING PRELIMINARY APPROVAL OF CLASS SETTLEMENT [ECF NO. 75]

☐ **BY TRANSMITTING** via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

☐ **BY UNITED STATES MAIL.** By placing the document listed above in a sealed envelope with postage thereon fully prepaid, in United States mail in the State of California at San Diego, addressed as set forth below.

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

- ☐ **BY PLACING** a true copy thereof enclosed in a sealed envelope, at a station designated for collection and processing of envelopes and packages for overnight delivery by **FedEx** as part of the ordinary business practices of GORDON REES SCULLY MANSUKHANI, LLP described below, addressed as follows:
- ☐ **BY PLACING** a true copy thereof enclosed in a sealed envelope, at a station designated for collection and processing of envelopes and packages for overnight delivery by Express Mail by U.S. post office as part of the ordinary business practices of GORDON REES SCULLY MANSUKHANI, LLP described below, addressed as follows:
- ☒ **BY ELECTRONIC FILING.** I hereby certify that on **February 5, 2021**, a copy of the foregoing document(s) were filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.
- ☐ **BY ELECTRONIC MAIL.** I caused such document to be electronically mailed in PDF or WORD format as an e-mail attachment to each addressee for the above-entitled case. The transmission was complete and confirmed. A copy of the transmittal e-mail will be maintained with the original document in my office.

Keren E. Gesund, Esq. GESUND & PAILET, LLC 5550 Painted Mirage Road Suite 320 Las Vegas, NV 89149 Tel: (702) 300-1180 Fax: (504) 265-9492 keren@gp-nola.com	<i>Attorneys for Plaintiff</i>
O. Randolph Bragg HORWITZ, HORWITZ & ASSOCIATES, LTD. 25 E. Washington Street, Suite 900 Chicago, IL 60602 Tel: (312) 372-8822 rand@horwitzlaw.com	<i>Attorney for Plaintiff Pro Hac Vice</i>

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on February 5, 2021.



Jeanne P. Farrar